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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

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13 IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

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This Document Relates to:

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*Nokia Corporation and Nokia, Inc. v. AU
Optronics Corporation, et al.*, Case No. 09-
cv-5609

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*Best Buy Co., Inc., et al. v. AU Optronics
Corporation, et al.*, Case No. 10-cv-4572

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*Costco Wholesale Corporation v. AU
Optronics Corporation, et al.*, Case No. 11-
cv-0058

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MDL File No. 3:07-md-1827 SI

**STIPULATION AND [PROPOSED]
ORDER MODIFYING FACT
DISCOVERY CUTOFF DATE FOR
HITACHI, LTD. AND HITACHI
DISPLAYS, LTD.'s 30(b)(6)
DEPOSITION(S) AND RESPONSES TO
NOKIA'S FIRST SET OF REQUESTS
FOR ADMISSION**

1 Plaintiffs Nokia Corporation, Nokia Inc., Best Buy Co., Inc., Best Buy Purchasing
2 LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Magnolia Hi-Fi, Inc., and
3 Costco Wholesale Corp. (collectively, "Plaintiffs") and Defendants Hitachi, Ltd. and
4 Hitachi Displays, Ltd. (collectively, the "Hitachi Defendants") hereby stipulate as follows:

STIPULATION

6 WHEREAS fact discovery closes in the above-captioned matters on December 8,
7 2011, as set forth in the Stipulation and Order Modifying Pretrial Schedule for “Track One”
8 Direct Action Plaintiff and State Attorney General Actions (Dkt. No. 3110, the “Scheduling
9 Order”);

10 WHEREAS Plaintiffs served the Notice of Deposition of Hitachi, Ltd. and Hitachi
11 Displays, Ltd.’s pursuant to the Federal Rules of Civil Procedure 30(b)(6) (“Notice”) on
12 November 17, 2011, scheduling the deposition(s) to take place on December 6, 2011;

13 WHEREAS the Hitachi Defendants intend to serve objections to the Notice on
14 December 15, 2011, and thereafter Plaintiffs and the Hitachi Defendants intend to meet and
15 confer in good faith regarding the proposed deposition topics;

16 WHEREAS Plaintiffs and the Hitachi Defendants have conferred regarding the
17 schedule set forth in the Scheduling Order and do not believe that the current schedule
18 allows for sufficient time to meet and confer regarding the proposed deposition topics and
19 to make witnesses available for deposition on the agreed upon topics;

20 WHEREAS Plaintiffs and the Hitachi Defendants agree to an extension of the close
21 of fact discovery until the end of January 2012 for the limited purpose of allowing
22 sufficient time for Plaintiffs to take the noticed 30(b)(6) deposition(s) of Hitachi, Ltd. and
23 Hitachi Displays, Ltd.;

WHEREAS Nokia Corporation. and Nokia Inc. served its First Set of Requests for
Admission (“Requests”) on the Hitachi Defendants on November 8, 2011;

WHEREAS Nokia Corporation, Nokia Inc. and the Hitachi Defendants have conferred regarding the schedule set forth under the Federal Rules and have agreed to an

1 extension of the close of fact discovery until December 23, 2011 for the limited purpose of
2 allowing the Hitachi Defendants to respond to the Requests;

3 NOW, THEREFORE, Plaintiffs and the Hitachi Defendants, through their
4 undersigned respective counsel, stipulate and agree as follows:

5 The fact discovery cutoff date of December 8, 2011 in the above-captioned matters,
6 as set forth in the Scheduling Order, is extended solely as to the noticed 30(b)(6)
7 deposition(s) of Hitachi, Ltd. and Hitachi Displays, Ltd., up to and including January 31,
8 2012.

9 The fact discovery cutoff date of December 8, 2011 in *Nokia Corporation and*
10 *Nokia Inc. v. AU Optronics Corporation, et al.*, Case No. 09-cv-5609, as set forth in the
11 Scheduling Order, is extended solely as to the Hitachi Defendants' responses to Nokia
12 Corporation and Nokia Inc.'s First Set of Requests for Admission, up to and including
13 December 23, 2011.

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15 DATED: December 7, 2011.

/s/ Kent M. Roger

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21 *Counsel for Defendants Hitachi, Ltd., Hitachi Displays,*
22 *Ltd. and Hitachi Electronic Devices (USA), Inc.*

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STIPULATION AND [PROPOSED] ORDER MODIFYING
DATES OF DISCOVERY CUTOFF FOR HITACHI 30(b)(6)
DEPOSITION(S) AND RESPONSES TO NOKIA'S FIRST SET
OF REQUESTS FOR ADMISSION
Master File No. 3:07-md-1827 SI, MDL No. 1827

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/s/ Valarie C. Williams

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/s/ Roman M. Silberfeld

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/s/ David J. Burman

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Counsel for Plaintiff Costco Wholesale Corporation

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ATTESTATION: Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from each signatory hereto.

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Dated: December 7, 2011

By: /s/ Kent M. Roger
Kent M. Roger

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STIPULATION AND [PROPOSED] ORDER MODIFYING
DATES OF DISCOVERY CUTOFF FOR HITACHI 30(b)(6)
DEPOSITION(S) AND RESPONSES TO NOKIA'S FIRST SET
OF REQUESTS FOR ADMISSION
Master File No. 3:07-md-1827 SI, MDL No. 1827

1 **IT IS SO ORDERED.**

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3 Dated Entered: 12/12/11

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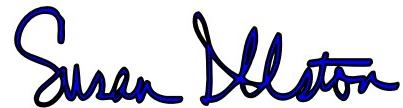
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The Honorable Susan Illston
District Court Judge